

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ALABAMA  
NORTHEASTERN DIVISION

CONSTRUCTION MATERIALS, )  
LTD, INC. )  
 )  
 Plaintiff, )  
 )  
 v ) CV-02-RRA-1155-NE  
 )  
 Equal Employment Opportunity )  
 Commission ("EEOC") )  
 )  
 Defendant. )

**PLAINTIFF'S DISCOVERY TO DEFENDANT  
EQUAL EMPLOYMENT OPPORTUNITY COMMISSION**

Now comes the Plaintiff, pursuant to the specific allowance of the Court through its Order of November 9, 2005, who requests that the Defendant respond to the following interrogatories in accordance with Federal Rule of Civil Procedure 26 and 33:

**PLAINTIFF'S INTERROGATORIES TO DEFENDANT**

For the purpose of this discovery, the term "respondent" refers to the person or entity named in an EEOC charge by a charging party filing an EEOC charge.

1. For the years from January 1, 1999, to October 31, 2005, provide the following information:

a. the month, day and year on which Defendant received from each and every respondent named in an EEOC charge, a request for documents, whether made directly or indirectly, pursuant to the Freedom of Information Act (FOIA). (If a respondent named in an

EEOC Charge made more than one request for documents, state the month, day and year of those subsequent requests made by each such respondent)

b. For each respondent request identified in subparagraph a. above, please state the following:

1. The month, day and year of each and every response to such respondent regarding the requested document production and

2. The month, day and year some or all of the documents requested from EEOC were actually mailed and/or delivered to the requesting respondent.

3. For the period of time from January 1, 1999, to October 31, 2005, and for each and every document request made to Defendant by any respondent, state the number of days from the first FOIA request until Defendant actually provided some or all of the documents pursuant to the Respondent's request for such Documents.

4. For the period of time from January 1, 1999, to October 31, 2005, state the number of requests made directly or indirectly to Defendant, pursuant to the Freedom of Information Act, to which the Defendant failed to respond or to provide any documents requested and for each such failure, state the reason for such production failure by Defendant.

5. For the period of time from January 1, 1999, to October 31, 2005, state the total number of document requests made to Defendant, whether directly or indirectly, made pursuant to the

Freedom of Information Act.

6. For the period of time from January 1, 1999, to October 31, 2005, state the total number of document requests made directly or indirectly pursuant to the Freedom of Information Act, in which EEOC also furnished to each requester some or all of the requested documents on or before the time for production as that time is defined the Freedom of Information Act.

7. Has Defendant ever, on any occasion, since January 1, 1999, produced requested documents, either in whole or in part, pursuant to the Freedom of Information Act to any respondent person, firm or corporation making such request and made that production to the requester within the time provided by Congress under FOIA.

8. If the answer to Interrogatory Number 7 is in the affirmative, please identify by EEOC Charge No. and respondent's name and address, the entity receiving said documents within the time provided by law.

Submitted by,

Susan Williams Reeves  
Susan Williams Reeves  
ASB-4970-V84S  
Attorney for Plaintiff  
Reeves Law Offices  
714 South 29th Street  
Birmingham AL 35233-2810  
Telephone: 205-322-6631  
Fax: 205-322-7479  
E-mail: swrlaw@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Ed Ragland.

Date: November 16, 2005

Susan Williams Reeves  
OF COUNSEL